H04497 Convair Systems
3302 Pacific Hy SD 92101

FIELD NOTES FROM ONSITE VISIT OF 07-18-90 by C. Graulau

John Anderson (RWQCB), John Misleh (HMMD), Ben Franklin (HMMD) and I had a scheduled appointment to inspect Building #75 at Convair Systems, General Dynamics on July 18th at 1:00. We arrived onsite together, were met by John Fields (GD), received visitor badges, and then met with Gerry Hardacre (GD), John Fields (GD), Jim Atkinson and Robert Lynn in Gerry Hardacre's office.

I began the discussion, explaining the purpose of our visit. The outlines for responsibilities were described as follows:
Ben Franklin - hazardous waste generator inspection, and assist with sampling of sump sludges/liquids.
John Anderson - assist HMMD in determining if sump in bldg 75 was subject to Surface Impoundment (Toxic Pits) legislation.
John Misleh - assist with sampling of liquids/sludges in sump.
Christina Graulau - follow-up with HIRT incident of 12-31-90, assist with hazardous waste generator inspection and sampling of sump liquids/sludges.

The following notes relate to topics discussed and are not necessarily complete or in any chronologic order.

I asked what the summary of the site assessment report found with respect to the fate of liquids lost in HIRT incident of 12-31-90. Gerry Hardacre stated he was not comfortable with the conclusions of the site assessment report, and further work was to be done. He stated that the site assessment found elevated levels of total chrome in the soil (approximately 25 ppm) around building 75. He stated that through visits and conversation with industrial waste, none of the liquid made it into the sanitary sewer. He stated that the storm drains had been inspected and none of the liquid made it into the storm drain. He stated that a bid would soon be made to have Groundwater Technology Incorporated perform 2 years worth of environmental consultation/work. He stated this would include having a dye test done with sodium bromide, in order to determine whether material which leaks into the ground from building 75 can make it into the sanitary sewer or storm drain. Gerry explained that when CH2M Hill tried to do the dye test, the test was inconclusive due to the high background level of dye penetrant which was a permitted discharge to the sanitary sewer.

I asked if the sanitary standpipe had been relocated yet, John Fields stated no. He then went on to explain the proposed corrective action and overlapping programs with industrial waste and HMMD. He gave me a copy of a diagram for these project tasks and schedule. John Fields stated that since the facility had been able to repair plumbing leaks (of tap and rinse waters), he had

noticed a significant decrease in the amount of liquids accumulating in the sump area. John Fields stated that on a daily basis a records is made as to the inches measured in the sump area. He showed me this log.

I asked Gerry if he thought there was any negligence on the part of the bladder installation contractor for the failure of Tank #140 on 12-31-90. Gerry stated that contact had been made with the insurance company of General Dynamics relating to this issue. Gerry also stated that the same man who installed this bladder was the person who installed a bladder for him when Gerry worked at Singer, and there was a similar incident. Gerry Hardacre stated that he wanted to double-contain Tank #140 (nitric/hydrofluoric etch). He stated that he did not know the feasibility of this, but he was aware that Joor and other manufacturers may be contacted about this possibility.

John Fields explained that they are in the process of eliminating the sulfuric Acid Anodize, and researching the feasibility of changing the process line to non-chromated solutions.

I asked when the sump floor was to be cleaned and inspected. John Fields stated that processing would be shut down, and over the weekend of July 28/29th, either IT or Disposal Control would come in to begin the work. He stated that if they needed more time, then the same arrangement would be made the subsequent weekend. He also stated that a condition of the contract would be that the chromium contamination must be eliminated to the allowable level of their industrial waste discharge. (2.77ppm) I stated that I would like to visit once the sump was dry, in order to inspect the floor myself for pitting, holes, damage. John stated he didn't think there were any holes in the concrete since the area was holding liquids. Gerry Hardacre stated that the concrete surface was damaged, simply by the action of the materials on the surface.

I asked if they had been managing the accumulation of liquids in the sump as hazardous waste. John Fields stated that as a result of the chromic acid tank failure in October of 1989, all the resulting liquids accumulating in the sump had been contaminated with approximately 100-1000ppm of hexavalent chromium. He stated that prior to the chromic acid spill the facility was able to manage the accumulation of liquids as industrial wastewater.

I explained that I believed the hazardous liquids in the sump to be improper storage of hazardous waste. I stated that if John Anderson made a determination that the sump was subject to legislation as a surface impoundment that I would not pursue the sump being subject to emergency containment dike criteria.

John Fields explained that all industrial wastewater from all processes at the plant is planned to be piped to an industrial wastewater pretreatment system.

I suggested that despite having the sump floor cleaned and

inspected, the facility install pumps and continually pump any liquids that hit the sump floor into an aboveground storage tank, for proper management. I suggested this be incorporated in addition to having an industrial wastewater pretreatment system installed.

I asked whether the facility did any sampling of the sanitary sewer, storm drains, or anywhere on the date of the incident. Gerry and John stated no. Gerry stated that on January 1st a sample was taken of the stormdrain outside of bldg 75 and it had a normal pH. John Misleh asked if anyone had taken a sample of the storm drain outside of bldg 75 on the day of the incident. Gerry stated that someone had taken a sample and it did have a low pH and some metals. Gerry explained that during the cleanout and recharge of the Tank #140, materials, and drums of acid were staged in that area and he thought there might have been a spill to the storm drain. I asked if the pillow in the stormdrain was inflated. John Fields stated yes, and all stormdrain pillows in the area were inflated, therefore allowing only a small area to exist in the stormdrain. I asked if the storm drain balloons were damaged due to the acid. John Fields stated no, that they are made of rubber. John Fields also stated that it is difficult to sample industrial wastewater since on a normal day they typically use at least 800,000-900,000 gallons of water per day.

I asked if they knew whether there was a false-bottom to the sump, that I had heard it mentioned. Gerry stated that when they inspected the hole, there was a gap under the concrete, but they were not sure how far this gap extended, and whether it was due to the flushing action of the last liquids.

We observed the steam tunnel connection outside bldg 75. I observed liquid (water?), of unknown origin and content in the steam tunnel. John Fields explained this was the low end of the steam tunnel, and that liquid was rainwater.

We observed the sump floor had an accumulation of sludge, solid debris, and liquids in all cells of the sump, on the southwest end. There were various colors of sludges, white-powdery accumulation in the corner of the alkaline tank #143, brown-red liquids and sludges along tanks 132-138. Greenish liquids and sludges along tanks 139 and 140. We observed dark pockets under tanks 132, 136 and 138. John Fields stated he thought it was stratified chromic acid. I observed circular, plastic tubes in the cinder bricks that the tanks sat upon. I did not observe liquid flowing in one direction or another, although I stated the plastic tubes may allow cross-contamination from neighboring cells.

John Anderson left while John Misleh gathered sampling equipment from his car. John Misleh suited in coveralls, goggles, gloves. Ben Franklin and I wore gloves and assisted with the sample collection.

Random pH field tests were done along the cells of the sump where

liquids had accumulated. Samples were taken, labeled, sealed, and packed in a cooler for transport to S-Cubed for analysis.

Sample #6006=liquid from under tank 136 (field pH=4)
We suspected liquid to be contaminated with chromium, due to the brown-red color that had suspended particles.

Sample # 6007 white powder w/blue-green-gray splotches from under tank 143 (field pH=10)
We suspected chromium, nickel, and zinc contamination.

Sample # 6008 brown-red sludge from under tank 132 (field pH=4).
We suspected very high levels of chromium contamination.

Sample # 6009 from storm drain outside bldg 75 (field pH=7)

Sample # 4011 from unknown hole inside bldg 75 (solid)

Gerry and I had a brief discussion about the fact that McDonnell Douglas recently announced a lay-off of 17,000 employees. Gerry stated that there are rumors Mitsubishi may buy out McConnell Douglas, and this may impact the contracts General Dynamics may have. Gerry stated that if contracts are not awarded to build more planes, or utilize the anodize line, then there is an outside possibility that the anodize line would be disassembled.